## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF VIRGINIA

CLERK, U.S. PLOTIST COURT

Samuel G. Bailey P.O. Box 706 Burgess, Virginia 22432 Phone: 571-329-2032

Plaintiff,

Civil Action No. 3: 194787 (JRS)

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Black Entertainment Television 1235 W St., NE Washington, DC 20018 Serve: Ms. Debra Lee

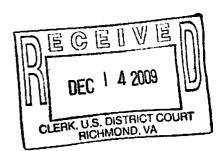
Paramount 5555 Melrose Ave. Los Angeles, Ca. 90038 Serve: Mr. Brad Gray

Viacom 1515 Broadway New York, New York 10036 Serve: Mr. Philippe Dauman

Defendants.

## COPYRIGHT INFRINGEMENT

Pursuant to 17 USCA 101-1032, this litigation is being Filed against the Defendants due to their violation of the Copyright statute against the Plaintiff. In 2006, Defendants Produced the movie "Dreamgirls" based upon Plaintiff's Screenplay "Poison Passion" without Plaintiff's consent. Actor Eddie Murphy played the character James Early in



"Dreamgirls", which was derived from the character "Prince Dominique Mack" in "Poison Passion". Both Characters were rhythm 'n' blues and soul music Performers.

Singer/Actress Beyonce Knowles played the Character of "Deena (Dina)" and "Cleopatra" in Dreamgirls, which was based on characters "Deena," "Conai", and "Cleopatra" in Plaintiff's script Poison Passion. Actress/Singer Jennifer Hudson was "Effi" (Effy) in Dreamgirls; Mr. Bailey's screenplay Poison Passion featured "Effy" (Effi). Each character in "Dreamgirls" was an exact replica of the aforementioned Characters in "Poison Passion", which is an exemplification of specific expression of idea (subplot) of Plaintiff's work.

This is not the first time Defendants committed Copyright Infringement against the Plaintiff. In 1992, they used his screenplay "Topless Burning Love" without his consent to make the major movie "Boomerang", which also featured Eddie Murphy. An out of court settlement was reached in that case.

If this case is not immediately resolved, Plaintiff will present the case to a multitude of media sources to acknowledge the public of their greed and selfishness in exploiting unknown and struggling screenwriters' materials for their own financial enrichment. Mr. Bailey will also agree to testify on behalf of other screenwriters who will be bringing forth litigation against various motion picture corporations.

Anyone who endeavors to deny this case its right to be heard in federal court will be charged with proper civil and criminal allegations.

Plaintiff seeks compensatory and punitive damages of \$200,000,000.00.

County/City of NOTTOMORNO ACC
Commonwealth/State of Y17 O1010

The foregoing instrument was acknowledged
before me this TW day of DECOMORY

OPEN, by

Comme of person sealing acknowledgment)

Notary Public

My commission explices: 10/31/2011

JAMIE M. ABERNATHEY
NOTARY PUBLIC
Commonwealth of Virginia
Reg. #7085040 (3) 11
My Commission Expires 10 (3)

## CERTIFICATE OF SERVICE (VIA 15T Class Mail)

I, Plaintiff Samuel G. Bailey, do hereby confirm that the aforementioned Complaint is being sent to the ensuing parties on the day of December 8<sup>th</sup>, 2009. The Parties are:

- Black Entertainment Television 1235 W St., NE Washington, DC 20018 Serve: Ms. Debra Lee
- Paramount
   5555 Melrose Ave.
   Los Angeles, Ca. 90038
   Serve: Mr. Brad Gray
- Viacom
   1515 Broadway
   New York, New York 10036
   Serve: Mr. Philippe Dauman

County/City of Worth Umbarlang
Commonwealth/State of \/\Y C\\ \\\C
The foregoing instrument was acknowledged before me this 100 day of 100 CO MOLE
hatore me this +11 day of 12 COMOVE
Samuel G. Barley
(name of person seeking acknowledgment)
Notary Public Mer commission expires: (0/31/11

JAMIE M. ABERNATHEY

NOTARY PUBLIC

Commonwealth of Virginia

Reg. #7085040

My Commission Expires 10/31

6 United States Dietrist County for England Mathed of Un. 701 East Broad M. Suite 30.

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